DECLARATION OF GERALD ARMSTRONG

- I, GERALD ARMSTRONG, declare as follows:
- 1. I have personal knowledge of the facts set forth in this affidavit, except where so stated and then in such instances, my knowledge is predicated upon information and belief.
- 2. I was a member of the Sea Organization of Scientology from February 1971 to December 1981, during which time I held many positions and was in many locations where I directly observed L. RON HUBBARD and other Scientology executives. During this period of time, I personally met with, spoke to, and had numerous dealings with L. RON HUBBARD, Kima Douglas, Michael Douglas, Laurel Sullivan, David Miscavige, James Isaacson, Ann Broeker, Pat Broeker, and Lyman Spurlock. Each of the above-named individuals have held various positions as executives and agents and employees within the Church of Scientology, while at the same time, being directly answerable to L. RON HUBBARD, who totally controlled the Church of Scientology, based upon my own observations from at least February 1971 until the time that L. RON HUBBARD disappeared in March 1980 from Hemet, California.
- 3. After Mr. HUBBARD disappeared from Hemet,
 California, David Miscavige became the head of the Church of
 Scientology, and Lyman Spurlock became its highest financial
 official. James Isaacson worked for David Miscavige and in
 connection with the financial management of the Church and L.
 RON HUBBARD's personal accounts. Laurel Sullivan was one of
 the highest Church officials, specifically in charge of a

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project called the "MCCS" Mission, which related to the control of L. RON HUBBARD of all aspects of the Church of Scientology.

In January 1980, I was approved for a project by L. RON HUBBARD to collect materials about his life for the purpose of providing such documentation for a biography to be written by Omar V. Garrison. Between that time and December 1981, I collected thousands of pages of documents, many of which are in the personal handwriting of L. RON HUBBARD and which prove, beyond question, that Mr. HUBBARD had continually misrepresented himself, his accomplishments, qualifications, credentials, and physical and mental health history. example, Mr. HUBBARD's physical, emotional and mental health history has been totally misrepresented to the public as being In fact, shortly before Mr. HUBBARD'S disappearance, I personally observed him, I was personally knowledgeable of his state of health at the time, and I have personal knowledge of numerous documents relating to his health history including his Veteran's Administration files, Naval files, and correspondence. Shortly before Mr. HUBBARD disappeared, he was in a state of very poor mental, emotional and physical health. I personally observed him fly into maniacal rages over trifling items, and display other symptoms of serious incompetency and emotional instability. In late 1977, Mr. HUBBARD wrote a letter in which he indicated that his health was very poor but that it was not desirable public knowledge that his poor state of health be made known. In that correspondence, he alluded to his suffering from pulmonary embolisms, duodenal ulcers,

chronic viral pneumonia, and othe such problems. At the same time as Mr. HUBBARD wrote the previous letter, he was sending orders to Church officials to represent to the public that he was in great physical, mental and emotional health. In short, Mr. HUBBARD, based upon my own personal observations of him, is deluded and unable to properly perceive reality. Another such example of misrepresentation and inability to perceive reality relates to a dispatch that he wrote to the highest Scientology officials shortly before his disappearance in which he stated that the creation of Scientology as a "religion" was not his idea but had come about when the membership of Scientology in the early 1950's, unbeknownst to him, had voted to form a "church." I personally saw and read that dispatch. This statement is a total lie.

5. Misrepresentation, fraud, and inability to perceive reality, and collusive connection between the Church of Scientology and L. RON HUBBARD is also demonstrated by the fact that the highest officials of the Church of Scientology, including David Miscavige and others, have totally misrepresented Mr. HUBBARD's status within the Church. For example, in the 1970's, Mr. HUBBARD had received millions of dollars through a front corporation called Religious Research Foundation, specifically set up to funnel money to him, which should have been paid to the Church of Scientology. At a strategy meeting held on September 29, 1980, after Mr. HUBBARD's disappearance, and when Mr. HUBBARD's whereabouts were unknown, numerous conflicting statements were made by high-ranking Church officials as to their ability to

communicate with Mr. HUBBARD. This conversation was taperecorded with the knowledge of all present. The taperecording reveals the fraudulent nature in which Church
officials design strategies to deceive the public as to the
status of Mr. HUBBARD.

Based on my ten years of observations within the Church of Scientology, I have personal knowledge that there has been a continued pattern of fraudulent statements and conduct by high Church officials relative to their relationship and the Church's relationship with Mr. HUBBARD. such example is the signing of Mr. HUBBARD's name by high level Church officials and the notarization of documents by Church members purporting to have been notarized in the company of Mr. HUBBARD and others. For example, I have personal knowledge that Bonnie M. Gang routinely notarized documents in California on behalf of Church officials where the individuals who supposedly signed the documents never appeared before Bonnie Gang as a notary public. This was routine prac-I also have personal knowledge that individuals such as Pat Brice and Joyce Popham and others routinely signed Mr. HUBBARD's signature to correspondence and other docuemnts where such documents were held out to the public and to third parties as personally coming from L. RON HUBBARD. personally observed this being done on a routine basis. fact, I currently have possession of a book, which was allegedly autographed by L. RON HUBBARD, but I know that the signature of HUBBARD was in fact signed by Pat Brice. have knowledge that it was routine practice of the Church of

Scientology to sell such books as personal autographed copies of books of L. RON HUBBARD for a price in the range of approximately \$500.00 when in fact Mr. HUBBARD never signed them.

- 7. I have personal knowledge tht it was Mr. HUBBARD'S intent to establish a permanent residence in Southern California on or after May 1976, and I personally participated in numerous activities to establish this residence. The facts are as follows:
 - other people, Gary Reisdorf, then my assistant, Clarise Barnett, and Jill Goodman, Commodore's Messenger Org members who worked for L. RON HUBBARD, to Los Angeles where we met with Duke Snyder, then Deputy Guardian U.S., second in command of the United States Guardian's Office of the Church of Scientology.
 - b. I was taken by Duke Snyder to Culver City, California where we set up three apartment units with telex machines and mail and freight lines so that Mr. HUBBARD could communicate through the Guardian's Office to Church of Scientology organizations throughout the world.
 - c. In early June 1976, Mary Sue Hubbard,

then controller of the Guardian's Office, and her personal staff arrived and set up residence and operations. A few days later Mr. HUBBARD arrived with his staff and similarly set up residence and operations at this Culver City "staging area." This was a staging area for the purchase of a home and property for Mr. HUBBARD in LaQuinta, California. I had personal knowledge of a number of projects regarding the requirements for the LaQuinta property including the availability of cable T.V.

- d. In late 1976, Mr. HUBBARD moved to
 LaQuinta. In the fall of 1978, Mr.
 HUBBARD ordered various renovations
 to his property at LaQuinta, which I
 participated in including the removal
 of all fiberglass insulation, the
 cleaning of all ducting, tiling
 projects, carpeting projects, air
 conditioning cleaning, and the
 inventorying of his personal
 belongings.
- E. In late 1978, Mr. HUBBARD approved for purchase, a five-hundred acre golf course and resort complex at

Gilman Hotsprings, near Hemet, California and about 40 miles west of the LaQuinta property. It was determined at that time, that Mr. HUBBARD's permanent residence would be at Gilman Hotsprings, California. I have personal knowledge from hundreds of dealings with high level Church officials and with Mr. HUBBARD that it was his intent to establish a rsidency at this location at that I was personally involved in the renovations of the house at Gilman Hotsprings that was ordered by him including the stripping of attic insulation, re-wiring of the house, tiling and carpeting projects, complete interior redecorating, and numerous other such projects, including the installation of a sophisticated television antenna system ordered by Mr. HUBBARD.

f. During most of 1979, I personally supervised the renovation of Mr. HUBBARD's office suite at Gilman Hotsprings,

California including tiling, carpeting air conditioning, decorating and various bathroom projects

- appearance in March 1980, Mr. HUBBARD
 lived, along with about ten personal
 staff members, while his Gilman Hotsprings
 home was being renovated, in an apartment
 complex in Hemet about five miles from
 the Gilman Hotsprings property. I was
 then in charge of Mr. HUBBARD's personal
 household unit at Gilman Hotsprings and
 had to insure that his van in which he
 travelled was able to move about the
 property without being followed.
- h. Mr. HUBBARD stored on the Gilman
 Hotsprings property his personal
 belonging consisting of furniture,
 bedding, art pieces, household goods,
 appliances, papers and writings, and
 one of my assistants was responsible
 for the storage and inventorying of
 these belongings.
- of HUBBARD and Kima Douglas, my senior,
 I became involved in a project to build
 Mr.HUBBARD a completely new house near
 Hemet. I was personally involved with
 the architectural plans for this property
 and saw an order from Mr. HUBBARD to have
 built around the property a high-block

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wall with openings for gun implacements. I had blueprints made of the plans and obtained a great deal of information for Bary Stein, Mr. HUBBARD's architect. I was assigned to locate the property upon which the home could be built and one of the requirements was that it would be within a half-hour drive of Gilman Hotsprings, California. Other requirements were that it be in a non-black area, dust-free, defensible, with no surrounding higher areas, and build on bedrock. After I located a property, I sent the proposal to Mr. HUBBARD which he approved and I was given a deposit to open an escrow fund.

- j. In connection with the property to build HUBBARD's house in the Gilman Hotsprings area, I also dealt with Bill Robertson, an engineer, relative to an earthquake fault that ran near the property. I also worked on a project in connection with the construction of Mr. HUBBARD's movie studio office on the Gilman Hotsprings property during 1979. Mr. HUBBARD approved the funds for all of these projects.
- 8. In March 1980, Mr. HUBBARD disappeared from Hemet,

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Calfifornia. At the time of his disappearance, two high level Scientology staff members, Pat Broeker and Ann Broeker, also disappeared with him. After his disappearance, Mr. HUBBARD was never seen or heard from again by any of us who had worked closely with him for more than a decade. After Mr. HUBBARD disappeared, David Miscavige assumed complete control of all Scientology organizations, based upon the alleged authority that he was the only person in direct communication with L. RON HUBBARD. It has been the policy and practice of those persons in senior positions in the Church of Scientology, such as David Miscavige and others to lie about Mr. HUBBARD's involvement with Scientology, his control of operations and finances, his whereabouts, his health, his mental and emotional competency and stability, and other such issues. For example, in 1976, in order to hide the fact from other Scientologists and from the public that Mr. HUBBARD had left the area of Clearwater, Florida, he had one of his personal staff from the neighboring town of Dunedin sign his name to dispatches sent to him from Scientology staff members. staff member, Joyce Popham, was so proficient at forging his signature and handwriting that she wrote messages like "very well done, " "thank you very much" and similar things in Mr. HUBBARD's handwriting back to organization staff who knew his writing. The forgeries were never discovered. The practice of having one of his staff sign his signature was on Mr. HUBBARD's order and was very common. Staff members whom I knew personally to have signed Mr. HUBBARD's name to letters, contracts or legal documents in inscriptions in books were:

Aletheia Taylor, Janice Kennedy, Laurie Jensen, Joyce Popham, Sue Anderson and Laurel Sullivan.

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- 9. It has also been the policy and practice of persons in senior positions in Scientology to originate communications in Mr. HUBBARD'S name as pretending to come from Mr. HUBBARD, without these communications ever being shown to him. The purpose of this is to create an impression that Mr. HUBBARD was doing something he actually wasn't or was somewhere he actually wasn't. Persons that I knew personally to have originated such communications were: Laurel Sullivan, Sue Anderson, Aletheia Taylor, Pat Price and Laurie Jensen.
- I also knew it was the policy and practice of Mr. HUBBARD and those in senior positions in Scientology to actually lie about HUBBARD's whereabouts and activities. was personally involved in a massive operation to locate and destroy all evidence concerning HUBBARD's connection to the Church of Scientology, control over its organizations and finances, his location and other such documents. Hotsprings, California, I was required to destroy all the memos I had received from HUBBARD ordering work to be done on his house and his properties. I was also ordered to destroy any other evidence of Mr. HUBBARD's mental and emotional illnesses, his fraudulent and misrepresented background, and the various tortious and criminal activities of the Church of Scientology. However, many of these documents I did not destroy but maintained possession of as part of the project HUBBARD assigned me to in connection with the preparation of his biography. These documents are currently on file in the

Los Angeles Superior Court in the case of Church of

Scientology v. Armstrong. In that case, I was sued by the

Church of Scientology of California and I have counter-sued L.

RON HUBBARD in connection with the right to possess these

documents. However, Mr. HUBBARD has failed to appear and

claim said documents, notwithstanding the fact that his wife,

Mary Sue Hubbard, has intervened in the action and has claimed

that the documents belonged to her, that her husband has a

right of privacy in the documents, and that the documents are

worth millions of dollars. The Los Angeles Superior Court has

recently denied Mary Sue Hubbard claim to obtain possession of

the documents and the documents are currently under seal in

said court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of May, 1983 at Los Angeles, California.

GERALD ARMSTRONG